

# Lantmännen's privacy policy and information about cookies

#### Introduction

Lantmännen ekonomisk förening and Aspen process personal data about persons who visit and use our websites, mobile apps and social media platforms ("**Digital Channels**") and about persons who participate in evaluations, campaigns or competitions organised by any of the companies within Lantmännen or who contact us in connection with customer issues.

This Privacy Policy describes how we process your personal data, what rights you have in connection with it, and what cookies we use in connection with our Digital Channels.

Your privacy is important to Lantmännen and we strive for a high level of protection in all our personal data processing. All personal data processing carried out within Lantmännen is performed in accordance with applicable data protection legislation. Within the EU/EEA, the General Data Protection Regulation (GDPR) applies from 25 May 2018<sup>1</sup>. As most of Lantmännen's companies are covered by European legislation, this policy is based on the GDPR. Local data protection legislation outside the EU/EEA will be taken into account where relevant.

Specific information regarding personal data processing might be provided in connection with Lantmännen's Digital Channels, which, in such case, will take precedence over this general information.

#### What is personal data?

Personal data means any information, which can be linked directly or indirectly when combined with other data, to a living natural person. This means that different types of information such as name and contact details, IP addresses, competition entries, purchase history, case information and photographs constitute personal data.

<sup>&</sup>lt;sup>1</sup> Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation).



# What personal data do we collect about you?

## When you visit our Digital Channels

When you visit or use our Digital Channels, we may collect data that you choose to submit to us, for example your name, postal address, e-mail address and phone number. We may also collect personal data through cookies as described under "Information about cookies - and how to avoid them" below.

## When you participate in competitions, other marketing activities, evaluations or tasting panels

If you participate in competitions or other marketing activities organised by any of the companies within Lantmännen, competition entries and other necessary data about you (for example to administer prizes) will be processed. If you participate in an evaluation activity for any of Lantmännen's products, your ratings and suggestions, as well as data on gender and age, will also be processed. If you participate in tasting panels, we will also process data regarding any food allergies you might have.

#### When you are in contact with customer services or communicate with us in other ways

When you communicate with us, for example, when you ask customer services something or if you have queries in connection with a complaint regarding a product, we may process case data, other than your contact details, such as customer number, complaints, requests and other data you provide about yourself while in contact with us.

# Purposes for which we process your personal data

We process your personal data for various purposes, depending on whether you visit our Digital Channels, participate in competitions, other marketing activities, evaluations or tasting panels, or communicate with us for other reasons:

- To deliver services or products that you order and to administer our agreements with you;
- To communicate with you and deal with your requests (e.g. handle returns/damages, complaints or comments etc.);
- To handle and respond to legal claims, e.g. during a dispute or litigation;
- To administer events, competitions and prizes. Competition entries may be published during marketing;
- To follow-up and evaluate Lantmännen's products, for example through tasting panels;
- To maintain, develop, test and improve our Digital Channels and the technical platforms on which they are delivered;
- To generate statistics regarding the use of our Digital Channels; and
- To market products and services from companies within Lantmännen (including by email and text/picture messages) that may be of interest to you. If you do not wish to receive such information, please contact us at <u>dataprotectionofficer@lantmannen.com</u>. You can also choose to opt out of electronic marketing by following the link in the email we send to you.



## Legal basis for our personal data processing

Lantmännen always processes your personal data in accordance with applicable law. We process your personal data when necessary for the performance of a contract with you, to handle any complaints, or other types of customer service issues. We also process your personal data when we have another legitimate and justifiable interest to do so, for example an interest in marketing our company to visitors on our Digital Channels, an interest in developing our Digital Channels or in communicating with you (e.g. via customer services).

If Lantmännen was to process your personal data for any purpose, which requires your consent under applicable data protection legislation, we will obtain your consent in advance.

#### Erasure

Lantmännen will only process your personal data for as long as necessary in order to fulfil the purposes of the processing. We have procedures in place to ensure that your data are erased thereafter.

#### Security for the protection of personal data

Lantmännen safeguards your personal data with a high level of security and has to this end, implemented appropriate technical and organisational security measures to protect your personal data from unauthorised access, amendments, dissemination or destruction.

#### Restrictions on disclosure of personal data

Lantmännen may appoint external partners to perform tasks on Lantmännen's behalf, such as providing IT services or helping with marketing, data analysis or statistics. The performance of these services may mean that Lantmännen's partners, both within and outside the EU/EEA, gain access to your personal data. Companies that manage personal data on Lantmännen's behalf must always sign an agreement with Lantmännen so that we are able to ensure a high level of protection of your personal data also with our partners. Lantmännen takes special safeguards with regard to partners outside the EU/EEA, such as signing agreements that include the standardised model clauses for data transfer adopted by the EU Commission and which are available on the EU Commission's website.

Lantmännen may also disclose your personal data to third parties, for example the police or other public authorities, if it concerns criminal investigations or if we are otherwise required to disclose such data by law or public authority decisions.

Lantmännen will not disclose your personal data to any extent other than described in this section.

#### External links

Lantmännen's Digital Channels may sometimes contain links to external websites or services that we do not control. If you follow a link to an external website, we recommend that you familiarise yourself with the principles for personal data processing and cookie information that apply to the site in question. This privacy policy only applies to Lantmännen's Digital Channels.



Right to information and right to lodge a complaint

You have certain rights in relation to the company within Lantmännen that is data controller for your personal data (see the contact details below):

- Right of access (register transcript) a right to obtain confirmation of and information about the processing of your personal data.
- Right to rectification a right to have erroneous data rectified.
- Right to erasure a right to have data removed. This right is limited to processed data, which legally requires your consent, if you withdraw consent and oppose the processing.
- Right to restricted processing a right to request that the personal data processing is restricted, for example, if you oppose the accuracy of the data. During the investigation of the accuracy of the data, Lantmännen's access to the data is restricted.
- Right to data portability a right to request that personal data are transferred from one data controller to another. This right is restricted to data that you have supplied to us yourself.

## Information about cookies - and how to avoid them

#### Lantmännen's use of cookies

We use cookies on our websites. A cookie is a small text file placed on your computer in order, for example, to facilitate certain features such as navigation on the website. We also use cookies to aggregate statistics about the number of visitors to the website and obtain data about how the website is used. These data allow us to develop and optimise the website. Finally, we use cookies to see which adverts are relevant to you and to evaluate our advertising campaigns. For example, these cookies track whether you have seen an advertising campaign for other group companies on another website and been referred Lantmännen's website.

Lantmännen is only using the data collected through cookies on our websites for its purposes, i.e. not for third parties' purposes. Sometimes cookies collect personal data, for example, IP addresses and data linked to the IP address, but not personal data directly attributable to you as an individual.

Cookies may either be deleted automatically when the user closes their web browser (so-called "session cookies") or stored on the user's computer to facilitate future visits to the website (so-called "persistent cookies"). Likewise, Persistent cookies will be removed automatically after a specified period.



The cookies used on this Digital Channel are described in the table below.

Name	Type of cookie and function	Data stored	Storage period
ASP.NET_SessionId	This cookie is required for the website to function and is generated when you visit the site.	Required to identify the client with the web session.	Deleted when the web browser is closed.
Google Analytics: _utmat	Used to control the time interval on request from Google Analytics.	Tool to analyse visitor behaviour in order to improve customer experience and ensure the functionality of the website.	Deleted after 10 minutes.
Google Analytics: _utma	Used to distinguish between visitors and sessions. The cookie is updated each time the page is visited and the data are sent to Google Analytics.	Tool to analyse visitor behaviour in order to improve customer experience and ensure the functionality of the website.	Deleted 2 years after the latest visit (updated in event of activity).
Google Analytics: _utmb	Used to determine new sessions for each page visit. The cookie is updated each time the page is visited and the data are sent to Google Analytics.	Tool to analyse visitor behaviour in order to improve customer experience and ensure the functionality of the website.	Deleted 30 minutes after the latest visit (updated in event of activity).
Google Analytics: _utmc	Used to determine new sessions for each visit. The cookie is updated each time the page is visited and the data are sent to Google Analytics.	Tool to analyse visitor behaviour in order to improve customer experience and ensure the functionality of the website.	Deleted when the web browser is closed.
Google Analytics: _utmz	Stores the traffic source or campaign that explains how the user reached Lantmännen's website. The cookie is updated each time the page is visited	These cookies are used to display adverts that are relevant to the visitor and to find out how many visitors see an advertising campaign for Lantmännen on other sites and then	Deleted 6 months after the latest visit (updated in event of activity).



and the data are sent to Google Analytics.	make purchases on Lantmännen's website as well as to evaluate Lantmännen's advertising	
	campaigns.	

#### How to avoid cookies

You can block the usage of cookies by changing the settings of your web browser to reject storing of cookies automatically or inform you each time a website requests to store a cookie. You can also erase previously stored cookies through your web browser. If you block cookies, the functionality of our website may be affected.

#### Social networks

Our websites sometimes contains embedded content and sharing tools from social networks. These suppliers may therefore place cookies on Lantmännen's websites. Lantmännen has no access to or control over these cookies or the data they collect. You therefore need to check the websites of the relevant third party for further information about these cookies, and about how to opt out of receiving them.

#### Contact details for queries regarding personal data and cookies

Lantmännen ekonomisk förening, or, if relevant, another company within the Lantmännen Group, is data controller for the processing of your personal data. If you have any questions about how Lantmännen ekonomisk förening processes your personal data or uses cookies, or if you would like information about and contact details to the designated data protection officer/role responsible for personal data issues in other Lantmännen Group companies, please contact Lantmännen ekonomisk förening's data protection officer/role responsible for personal data issues at <u>dataprotectionofficer@lantmannen.com</u>.